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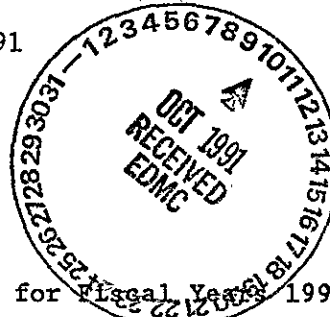
DEPARTMENT OF ECOLOGY

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October 2, 1991



Mr. Steven H. Wisness
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352



Re: Interim Stabilization Milestone Changes for Fiscal Years 1991 - 1996
(Change Number M-05-91-1)

Dear Mr. Wisness:

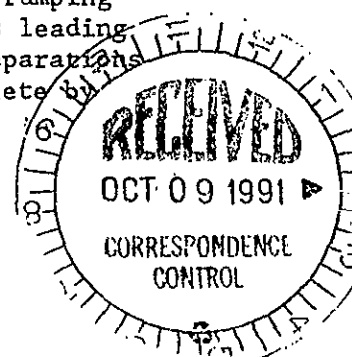
The Department of Ecology (Ecology) has reviewed the Change Request for the single-shell tanks (SSTs) interim stabilization milestones (M-05-03 through M-05-09) of the Hanford Federal Facility Agreement and Consent Order (HFFACO). As you know, Ecology and the Environmental Protection Agency (EPA) deferred a decision on this change to allow time for the Department of Energy (DOE) to submit additional supporting information for our review.

Based upon our review, Ecology has determined that we do not agree that the M-05-00 interim milestones should be placed on hold. Therefore, we are formally notifying you that we deny the change request for the SSTs interim stabilization milestones M-05-03 through M-05-09.

DOE cited three primary reasons for requesting this change. These reasons and the bases for our decision are as follows:

1. DOE has discovered that pumping activities require wastes from SSTs to be routed through ancillary equipment which have the potential to drain or will drain into tanks identified as "watch list" tanks pursuant to Public Law 101-510, Section 3137 (Wyden Amendment). The Wyden Amendment was passed on November 5, 1990. The watch list tanks were identified as early as January 30, 1991, in a letter from H.D. Harmon, WHC, to R.E. Gerton, DOE. Discussions were held between DOE-HQ and DOE-RL regarding what could be added to watch list tanks during the early part of 1990. DOE-RL based their activities on these decisions.

To meet milestone M-05-03, pumping was planned in the BY and C tank farms. As late as the August 13, 1991, monthly milestone update meeting, DOE had assured Ecology that these pumping activities would fulfill the requirements for M-05-03 by September 29, 1991, if pumping began in the C tank farm prior to the beginning of September. Pumping of SSTs 241-BY-102 and 241-BY-109 started June, 1991; all lines leading to watch list tanks were physically isolated. All physical preparations for pumping SSTs 241-C-102, 241-C-107, and 241-C-110 were complete by late August despite the unanticipated poor equipment conditions



encountered in the C tank farm. At this point, according to DOE assurances, interim milestone M-05-03 would be met.

However, on August 29, 1991, DOE-RL informed Ecology that pumping in the C tank farm would not be allowed per DOE-HQ's directive because of compliance problems with the Wyden Amendment. More specifically, Ecology was informed that when pumping stopped in the C tank farm, the residual liquids in the lines would drain back into tank 241-C-103; i.e., there would be an addition of waste to a watch list tank. Based on this, DOE determined pumping in the C tank farm would not be allowed. Furthermore, pumping of the BY tanks was also halted because of the potential for leakage of saltwell liquors into watch list tanks which would occur if the physical blockages in place to prevent materials entering watch list tanks failed. In sum, seven months after the watch list tanks were identified, DOE-HQ determined the impact to the interim stabilization program.

These late decisions to not pump in the C tank farm and halt pumping in the BY tank farm led to making it impossible for DOE to meet interim stabilization milestone M-05-03. Based on this, the request for change for M-05-03 is not timely pursuant to Article XL of the HFFACO and must be denied.

The next interim stabilization milestone, M-05-04, is still a year away. It is not yet apparent that rescheduling and application of sufficient resources to this project would not ensure DOE meeting this and subsequent milestones (also see 2 and 3, below). Therefore, at this time good cause pursuant to Article XL of the HFFACO has not been demonstrated and the request for change for interim milestones M-05-04 through M-05-09 must be denied.

2. DOE asserts the work required to prepare a tank farm for pumping is much greater than anticipated due to the physical and material condition of the tank farm facilities and the lack of accurate drawings and documentation. Although we appreciate the difficulties due to the existing tank farm conditions, these are not insurmountable as evidenced by the successful preparation activities which were brought to bear in the C tank farm. As such, this does not meet the requirement for good cause pursuant to Article XL of the HFFACO.
3. DOE states that the resolution of safety issues is uncertain for SSTs on the watch list. We recognize that resolution of the outstanding safety issues will be a complex and difficult undertaking. However, this does not preclude meeting the near term interim stabilization milestones by concentrating physical activities on tanks without these complications. Furthermore, these safety issues are the subject of ongoing work and it should be anticipated that the later interim stabilization milestones will benefit from these activities. As such, the request for change

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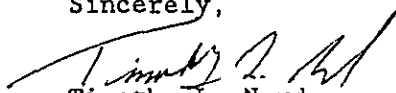
based on this is premature and does not meet the requirement for a timely change request pursuant to Article XL of the HFFACO.

The above points to a need for DOE to expand project scoping activities to an adequate level so that all details are taken care of in time to meet commitments. For the case of the SSTs interim stabilization program, meeting future interim milestones will be facilitated by timely and adequate discovery of safety concerns, compliance problems, and equipment shortfalls in time for appropriate corrective action. In particular, it is disconcerting to have received this change request shortly after the conclusion of negotiations on the previous SSTs interim stabilization change request.

Ecology is committed in assisting DOE to meet interim stabilization milestones. To that end, our respective staff must sit down in the next month and determine the appropriate course of action within the existing constraints in order to meet the requirement of interim stabilizing the SSTs by September, 1995.

As this is a state lead unit, should you have any questions regarding this matter, please contact Ms. Megan Lerchen at (206) 438-3089.

Sincerely,



Timothy L. Nord
Hanford Project Manager
Washington State Dept. of Ecology

cc: Christine Gregoire
Narda Pierce
Dana Rasmussen, EPA
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Subject: INTERIM STABILIZATION MILESTONE CHANGES FOR FISCAL YEARS 1991 - 1996
(CHANGE NUMBER M-05-91-1)

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